UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ABKCO MUSIC, INC., COLGEMS-EMI

-----X

MUSIC INC., EMI ALGEE MUSIC CORP., EMI APRIL MUSIC INC., EMI BLACKWOOD MUSIC INC., EMI CONSORTIUM MUSIC PUBLISHING, INC. d/b/a EMI FULL KEEL MUSIC, EMI CONSORTIUM SONGS, INC. d/b/a EMI LONGITUDE MUSIC, EMI FEIST CATALOG INC., EMI ROBBINS CATALOG INC., EMI UNART CATALOG INC., JOBETE: MUSIC CO., INC., SCREEN-GEMS-EMI MUSIC INC., STONE AGATE MUSIC, STONE DIAMOND MUSIC CORP., IMAGEM MUSIC LLC, PEER INTERNATIONAL CORPORATION, PSO LIMITED, PEERMUSIC LTD., PEERMUSIC III, LTD., SONGS OF PEER, LTD., SPIRIT CATALOG HOLDINGS S.A.R.L., SPIRIT TWO MUSIC, INC., WARNER-TAMERLANE PUBLISHING CORP. and WB MUSIC CORP.,

> Plaintiffs/Counterclaim-Defendants,

-against-

WILLIAM SAGAN, NORTON LLC, BILL GRAHAM ARCHIVES, LLC d/b/a WOLFGANG'S VAULT, BILL GRAHAM ARCHIVES, LLC d/b/a CONCERT VAULT, BILL GRAHAM ARCHIVES, LLC d/b/a MUSIC VAULT and BILL GRAHAM ARCHIVES, LLC d/b/a DAYTROTTER,

Defendants/Counterclaim: -Plaintiffs.:

X

BILL GRAHAM ARCHIVES, LLC d/b/a WOLFGANG'S VAULT, BILL GRAHAM ARCHIVES, LLC d/b/a CONCERT VAULT, BILL GRAHAM ARCHIVES, LLC d/b/a Case No. 15 Civ. 04025 (ER) (HBP)

Hon. Henry B. Pitman

DECLARATION OF
TAL E. DICKSTEIN ATTACHING
AMENDED EXHIBIT A TO
PLAINTIFFS' COMPLAINT

MUSIC VAULT and BILL GRAHAM ARCHIVES, LLC d/b/a DAYTROTTER,

Third-Party Plaintiffs,

-against-

THE NATIONAL MUSIC PUBLISHERS' ASSOCIATION, and DAVID ISRAELITE

Third-Party Defendants.

I, TAL E. DICKSTEIN, hereby declare as follows under penalty of perjury pursuant to

28 U.S.C. § 1746.

1. I am a member of Loeb & Loeb LLP, attorneys for Plaintiffs/Counterclaim-

Defendants and Third-Party Defendants. I am fully familiar with the facts set forth herein, and

respectfully submit this Declaration for the purpose of filing Amended Exhibit A to Plaintiffs'

Complaint.

2. Pursuant to the Stipulation and Order Regarding Filing of Amended Exhibit A to

Plaintiffs' Complaint (Dkt. No. 42) (the "Order"), an amended version of Exhibit A to the

Complaint in this action ("Amended Exhibit A") was deemed filed as of April 11, 2016, though

it was not attached to the Order when the Order was filed. (See Dkt. No. 42).

3. Accordingly, attached hereto as Exhibit 1 is a true and correct copy of Amended

Exhibit A.

Dated: New York, New York

April 12, 2016

/s/ Tal E. Dickstein

TAL E. DICKSTEIN

2